REMARKS

By this response, claims 1-26 are pending. Independent claims 1, 17, 18, 20 and 21 are amended to better differentiate the invention in view of the prior art. All other claims remain as originally or previously presented. Reconsideration of all is now requested as is a timely Notice of Allowance.

Substantively, the Examiner rejects claims 1-9 and 12-26 under 35 U.S.C. §102(e) as anticipated by Moyer et al. (U.S. Published Patent Application No. 2002/0174206). Insofar as it arguably relates to the instant invention, Moyer teaches the "manipulat[ion] [of] information (such as digital images) at a peripheral device (such as a digital camera or scanner) connected to a client." ¶ *[0022]*. Further, it does so via the functionality of web site including "a software component [212], such as a Java applet, that is downloaded to the client computer and executed within the web browser [100] without requiring the client computer to be rebooted or the web browser to be re-executed." *Id.* In some instances, peripheral device drivers 214 are fleetingly or relatively permanently installed on the client computer 204 if the client computer does not already contain the driver. *See, e.g.,* ¶¶ *[0023], [0026], [0031], [0032], [0053] - [0055].* T

As those of ordinary skill in the art will readily observe, all instances of operation require a network connection of sorts (e.g., TCP/IP Network 108) between the client computer and a particular web page, especially via the functionality of a web server 110 hosting a web site 112. In turn, the linchpin to Moyer's success includes the ability of the software component 212 of the web page to readily and somewhat freely interact with the peripheral device 202 (such as a camera) attached to the client computer 204. For this, the mechanism of the peripheral device driver 214 is configured to serve as an "intermediary between the web browser 100 (and/or the software component 212) and the peripheral device 202." ¶ *[0053].* In particular embodiments, the disclosed "software components" include

"any software component that may be executed by the web browser 100, such as a Java applet of an Active X control." ¶ *[0045]*. In the instance of applets, some touted benefits include direct interaction with users "through the same web browser that displays the web page containing the applet;" the non-requirement of "the installation of potentially conflicting DLLs;" and no rebooting." ¶ *[0074]*.

However, to the extent users of a client computer do not have a network connection, they can never use the functionality of Moyer. Moreover, to the extent users of the client computer do have a network connection, if the users leave the website having the software component, especially applet functionality, the users are unable to interact with peripheral devices and can never remove, install or otherwise use peripheral device drivers. In other words, the users of Moyer must always be connected in a network environment and have a web browser operational to a specific web site. Otherwise, Moyer cannot work. Support for this comes throughout the entirety of Moyer's teaching. That is, "an applet contained within a web page is typically removed automatically from the client computer's memory when the user navigates to another web page." ¶ *[0031]*. In ¶ *[0044]*, "[t]o transfer some or all of the device data 210 to the client computer 204, the user navigates the web browser 100 to a predetermined web page within the web site 112 (such as the web sites's home page)." Similarly, ¶ *[0075]* teaches that:

> since the user performs input and output through the web browser window, the entire process of installing the peripheral device driver 214, transferring the device data 210 from the peripheral device 202 to the client computer 204, processing to retrieve the data in image form, deleting the device data 210 from the peripheral device 202 to 'reload' the single use digital camera, and uploading the processed device data database may be performed within the same web browser window, thereby providing the user with a streamlined and simplified method for

>manipulating the device data 210 compared to conventional
>methods. *Underlining added.*

In all claims of the instant invention, however, the "monitoring" and the "fully automatically removing support information associated with the peripheral device" occurs "regardless of whether the computing device is networked or maintains a network connection." In this manner, the Applicant's invention does not require a specific arrangement of network connections to remove drivers, for example, and can do so anytime, especially upon "the detection of the event related to the end of persistence." It is appreciated by the present invention that modern computing devices have mobility and regularly change their relationship relative to peripheral devices, networks and other computers, but the monitoring for the end of persistence and fully automatically removing support information can occur in the pending claims (1-26) regardless of external arrangements, especially various connections. This is quite unlike Moyer that absolutely insists on 1) a network connection and 2) a connection to a particularly loaded web page in a browser of a client computer. As an example, the instant invention then embraces scenarios where a laptop computing device, an internet connection, and a hotel printer, for example, will be repeatedly connected and disconnected from one another over some period of time during a user's hotel stay. But, "the monitoring and the fully automatically removing support information" occurs <u>regardless</u> of these connections. Alternatively, if the printer driver could only be uninstalled upon a particular connection to a particular website via an internet connection, a user would then either need to remember to revisit the website if somehow they disconnected from the website or to go through a manual uninstallation process. Both of these scenarios defeat or frustrate the ease of operation of the instant invention.

Regarding the dependent claims of the invention, they are advanced as being patentable over the prior art as being dependent upon an independent claim having the above

generally-discussed limitation of the monitoring and the removing occurring "regardless of whether the computing device is networked or maintains a network connection." Again, Moyer insists on network connections for operability and unequivocally requires a specific website to be loaded in a browser of a client computer. This methodology, however, is overly complex.

Even further, claims 2, 3 and 4 require the storing of an indicator of the end of persistence. Claim 3 even requires it in a database of configuration settings. Claim 4 then requires the monitoring of the database of configuration settings.

Claims 5 and 6 both require the running of an event monitor thread. Claim 6 requires starting it "after booting" the computing device.

Claim 7 requires actually installing the peripheral device on the computing device prior to monitoring for the event related to the end of persistence. What the Examiner should appreciate about this claim, is that parent claim, claim 1, is broader in scope. Thus, claim 1 allows for the scenario of monitoring for events related to the end of persistence even before the peripheral device is installed on the computing device. In Moyer, however, installing and uninstalling drivers is based upon network connections and specific browsers. It does not then have any means for monitoring before installing. In turn, claims 8-16 all depend directly or indirectly from claim 7 and are patentable for the reasons related to claim 7.

Nonetheless, claims 8-16 are also patentable of their own merit. They all further define installation of the peripheral device on the computing device. In some instances, this relates to "providing a representation of a physical layout" of the peripheral device and "receiving an indication via the representation." *Claim 8.* In claim 9, providing the representation occurs via "accessing the representation via a browser application." In claims 12 and 13, retrieving support information relates to "querying" second computing devices. Claims 14 and 15 relate to "receiving" a location of and "retrieving" appropriate support

information and in what format this is acceptable. Claim 16 relates to a "temporal status" of the support information. Claims 10 and 11, of course, have already been indicated as allowable. The Applicant, thus, thanks the Examiner for this.
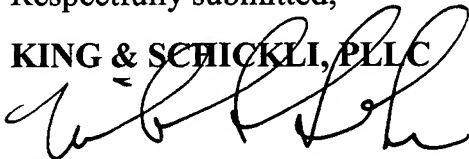
In claims 22-26, the instant invention distinguishes itself from Moyer by requiring the monitoring be a function of "assessing whether a volatile date and time stamp has been reached." In claims 23-26, the invention distinguishes Moyer by "setting" of the end of persistence, including: "invoking a plugin" (claim 24); performing it "during installation" of the peripheral device on the computing device (claim 25); and "wherein the installing further includes selecting of a peripheral device icon" (claim 26).

Consequently, the Applicant submits that all claims are in a condition for allowance and requests a timely Notice of Allowance to be issued for same. *To the extent any fees are due, the undersigned authorizes their deduction from Deposit Account No. 11-0978.* No extra fees, however, are believed due.

Finally, the Applicant maintains their request to change the attorney document number of record from 971-150 to 1363-010. The docket number changed when the most recent Power of Attorney went into effect.
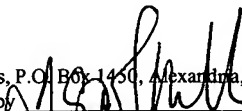
Respectfully submitted,

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